

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

KEVIN HARRIS,	:	
Plaintiff,	:	Case No.: JFM-02-CV-236
vs.	:	
CLUB HOLLYWOOD, INC., <u>et al.</u> ,	:	
Defendants.	:	

**MEMORANDUM OF REASONS AND AUTHORITIES IN  
SUPPORT OF CONSENT MOTION TO MODIFY SCHEDULING ORDER**

The Defendants, Club Hollywood, Inc., Harvey Blonder, Jeffrey P. Goldstein, and Roberta L. Goldstein, by and through their respective and undersigned counsel, submit this Memorandum in support of their Consent Motion To Modify Scheduling Order and state as follows:

1. Since May of 2003, the Parties have been engaged in settlement negotiations in an attempt to resolve this matter by a reasonable settlement rather than spending their resources on further discovery.
2. The Parties remain optimistic that a reasonable settlement can be reached, notwithstanding the differences between the Parties in how they have evaluated the issues of liability and damages. However, the Defendants believe that the filing of their dispositive motion on the deadline of June 30, 2003 will have a negative effect upon the negotiations between the Parties. Consequently, the Defendants would like to extend the deadline for them to file their dispositive motion in order to attempt to reach a reasonable settlement with the Plaintiff.
3. The Defendants believe that they will have exhausted their informal efforts at

settlement by July 14, 2003. Consequently, in the event that the Parties are unable to resolve this matter through a reasonable settlement, the Parties will have to file another joint motion to request a new scheduling order since they have not completed discovery, even though the Parties recognize that this Honorable Court has graciously extended the Scheduling Order at their request twice.

4. The Plaintiff consents to this Motion.

As requested in their Consent Motion, the Defendants respectfully request that the Scheduling Order be modified and that the deadline for the Defendants to file their dispositive motion be extended for sixty (60) days from June 30, 2003 to September 30, 2003.

Respectfully submitted,

JORDAN COYNE & SAVITS, L.L.P.

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